

EXHIBIT C

1 how much commission we got.

2 Q. Any other records?

3 A. No.

4 Q. Have you filed taxes on behalf of 495 Real
5 Estate?

6 A. No, sir.

7 Q. Okay. And last time, we discussed that
8 Monika Jain, your wife, is listed as the manager --
9 as a managing member of Eagle. Is that accurate?

10 A. It is accurate.

11 Q. But you also, I think you said, are the
12 decisionmaker and make the day-to-day decisions for
13 Eagle?

14 A. Yes, sir.

15 Q. Why is Monika Jain listed as the managing
16 member if you're the one that makes all the decisions
17 for Eagle?

18 A. This is the way we designed our company
19 from day one, and we keep it up like this way.

20 Q. Okay. Can you elaborate why you
21 identified Monika Jain as the managing member when
22 you're the one that makes all the decisions?

1 MR. KHAN: Objection, asked and answered.

2 THE WITNESS: No reason for why.

3 BY MR. SHAFFER:

4 Q. Okay.

5 A. This is the way we decided, this is the
6 way we keep it.

7 Q. And what does Monika Jain do for Eagle?

8 A. She really don't do anything for Eagle.

9 Q. Okay. All right. When you say she really
10 doesn't do anything, can you elaborate? Is there
11 anything that you recall that she --

12 A. So normally, I make a decision. And she
13 signs the paperwork.

14 Q. So she signs the paperwork as the managing
15 member for Eagle?

16 A. Yes, sir.

17 Q. Other than signing paperwork to execute
18 decisions that you make on behalf of Eagle, does she
19 do anything else?

20 A. No, sir.

21 Q. Okay. We're going to cover some of the
22 loans, but you're familiar with some of the loans

1 9135 is 8200 to Metro Sales & Services.

2 Where were those monies deposited?

3 A. The same answer, sir. On the bottom, it
4 show the account number. So this all, three checks,
5 deposited in the Metro account. I can go every check
6 if you like.

7 Q. Well, I guess my question is, from all
8 three checks, once they were put in Metro account,
9 what were they used for, do you know?

10 A. So the same answer, pay bills, pay back
11 Bala Jain monthly payments.

12 Q. Okay.

13 A. And pay other obligations.

14 Q. Okay. And I want to turn your attention
15 now to a new property now, 1010 Lynn Street. What do
16 you recall about that? Is there a loan between Eagle
17 and Bala Jain for that property?

18 A. Yes, sir.

19 Q. And how much is that loan?

20 A. 300,000.

21 Q. Has Eagle repaid any of the principal
22 balance on that loan?

1 A. No, sir. This loan was going on since
2 2017, I believe.

3 Q. Okay.

4 (A. Jain Exhibit No. 148 was
5 identified for the record.)

6 (A. Jain Exhibit No. 149 was
7 identified for the record.)

8 (A. Jain Exhibit No. 150 was
9 identified for the record.)

10 BY MR. SHAFFER:

11 Q. All right, sir. Do you have Exhibits 148,
12 149, and 150?

13 A. Yes, sir.

14 Q. So 148 is a note between you and Bala
15 Jain, or Eagle and Bala Jain dated July 30, 2019; is
16 that right?

17 A. Yes.

18 Q. And that's for \$300,000?

19 A. Yes, sir.

20 Q. Okay. And then 149 is a deed of trust
21 between you and Bala Jain for that same note for
22 \$300,000, correct?

1 A. Correct.

2 Q. And if you look at the top right-hand
3 corner, it shows that 1010 Lynn Street, the deed of
4 trust for Bala Jain for \$300,000, was not recorded
5 until July -- excuse me -- June 24, 2022; is that
6 right?

7 A. That's right.

8 Q. Okay. And then if you look at the deed of
9 trust identified as Exhibit 150, okay, it looks like
10 that on the 7th day of January, Eagle Properties
11 borrowed from Gus Goldsmith a separate loan. Do you
12 see that?

13 A. I see that.

14 Q. How much was that loan for?

15 A. I believe \$260,000.

16 Q. Did you disclose -- and was this deed of
17 trust -- this is also secured against the 1010 Lynn
18 Street property; is that right?

19 A. Yes, sir.

20 Q. Okay. Did you disclose to Bala Jain after
21 you borrowed the \$300,000 that you were going to
22 borrow money from Gus Goldsmith and record his deed

1 of trust before Bala Jain's deed of trust was
2 recorded?

3 A. No, sir.

4 Q. Okay. Why not?

5 A. I don't think that is necessary.

6 Q. Well, what is the property value at 1010
7 Lynn Street?

8 A. About 800, 8 to 900.

9 Q. And are there any other mortgages or loans
10 against that property?

11 A. Yes, sir.

12 Q. What other mortgages or loans are there
13 against that property?

14 A. So I believe there is a loan for 550,000
15 from a bank.

16 Q. Okay.

17 A. Let me think about the bank name.

18 Community Bank of Chesapeake.

19 Q. So there's a 500, approximately \$500,000
20 loan from Community Bank of Chesapeake.

21 A. Around 550,000, plus.

22 Q. And when does that date back to?

1 A. I'm sorry?

2 Q. When? When did you get that loan?

3 A. I believe 2016 or '17.

4 Q. So it's an older loan. And is it recorded
5 with -- is it secured with a deed of trust against
6 the property?

7 A. I have no idea if it's recorded or not,
8 but it is a loan.

9 Q. And then you've got another 260 from Gus
10 Goldsmith, right?

11 A. Right.

12 Q. So that's about \$760,000 loaned against an
13 \$800,000 property?

14 A. Yeah, give or take a little bit.

15 Q. So then Bala Jain loans you \$300,000,
16 which you didn't record with a deed of trust.

17 A. Right.

18 Q. And it wasn't recorded until this past
19 summer when Bala Jain requested it from Mr. Kotz; is
20 that right?

21 A. I think it's right.

22 Q. Okay. In June of 20 -- on June 24th, the

1 date of Exhibit 149, 2022, was Mr. Kotz still your
2 attorney? Was he still representing you in real
3 estate transactions?

4 A. He never been my attorney. He do
5 transactions for me.

6 Q. Okay. Was he still representing you in
7 June?

8 A. I don't remember, because I believe once
9 the lawsuit is filed, we stopped to do our business.

10 Q. Okay. Do you know when the lawsuit was
11 filed?

12 A. I think June or July.

13 Q. July, okay.

14 A. And Bala Jain recorded this deed. Of
15 course she have it, she always have a chance to
16 record it.

17 (A. Jain Exhibit No. 151 was
18 identified for the record.)

19 (Discussion held.)

20 MR. KHAN: Mark, would you mind -- sorry,
21 counsel, would you mind identifying Exhibit 149 and
22 150 for the record?

1 MR. SHAFFER: 149 is the deed of trust
2 between Bala Jain and Eagle Properties for \$300,000
3 for the 1010 Lynn Street.

4 MR. KHAN: Okay.

5 MR. SHAFFER: And then 150 is the deed of
6 trust between Eagle Properties and Gus Goldsmith for
7 1010 Lynn Street.

8 MR. BURNS: That's 46.

9 MR. SHAFFER: So I made it another one,
10 sorry.

11 MR. MUSGRAVE: I think we should just have
12 one --

13 MR. SHAFFER: I'm trying. Sorry, I'm
14 trying not to repeat that. Are we good?

15 MR. KHAN: I think that resolves it. And
16 151 is coming around.

17 MR. SHAFFER: Okay.

18 BY MR. SHAFFER:

19 Q. So the checks -- there's a check number
20 9136 to Vijay Kumar Patel, \$25,000. What is that
21 for?

22 A. The loan refund. He give me the money and

1 I pay him back.

2 Q. And how much of that \$25,000 came from
3 Bala Jain's funds?

4 A. I have no idea, sir.

5 Q. Look at check number 4149, Metro Sales &
6 Service for \$10,000, what is that for?

7 A. That one is deposited in Metro account.

8 Q. I'm sorry?

9 A. That one is deposited in the Metro
10 account.

11 Q. And what happened with it once it went in
12 Metro?

13 A. The same answer.

14 Q. And that answer is, it could be personal,
15 it could be business expense. You don't know how
16 much?

17 A. Yes, sir.

18 Q. Are you familiar with 449 Lawyers Road?

19 A. Yes, sir.

20 Q. And what is that property?

21 A. That property is in Vienna, Virginia.

22 Q. Okay. And who owns that?

1 A. I own that.

2 Q. Okay.

3 A. I means Eagle own that.

4 Q. Is that your family residence?

5 A. No, sir.

6 Q. Which one is your family residence?

7 A. 445 Windover Avenue.

8 Q. What are you doing with 449 Lawyers Road?

9 What is that being used for?

10 A. It is rented.

11 Q. It's what?

12 A. This property --

13 Q. Is a rental property?

14 A. Yes.

15 Q. How much rent are you getting from that?

16 A. So I'm getting about 2500.

17 Q. \$2500 a month?

18 A. Yes.

19 (A. Jain Exhibit No. 47, previously
20 marked, was identified for the
21 record.)

22 BY MR. SHAFFER:

1 Q. I'm handing you what's been previously
2 marked as Exhibit 47. And is this the deed of trust,
3 purchase money deed of trust between you and Bala
4 Jain for the amount of \$340,000 for the property
5 located at 449 Lawyers Road?

6 A. Yes, sir.

7 Q. Okay. And did Bala Jain fund the full
8 \$340,000?

9 A. Yes, sir.

10 Q. Okay. And has Eagle repaid any of the
11 principal amount of the \$340,000?

12 A. No, sir.

13 Q. Okay. And at the time that Bala Jain gave
14 that loan, I think you said that a deed of trust was
15 not recorded at first, right?

16 A. Right.

17 Q. Okay. And did you -- since you were given
18 the loan from Bala Jain for \$300,000, did you then
19 get additional deeds of trust from Fulton Bank?

20 A. Yes, sir.

21 Q. And was that recorded before Bala Jain's
22 deed of trust was recorded?

1 A. I'm sure it was recorded.

2 Q. And did you tell Bala Jain that you were
3 getting a loan from Fulton Bank for the 449 Lawyers
4 property, and they were going to record a deed of
5 trust?

6 A. No, sir.

7 Q. Okay. Why not?

8 A. She don't ask, I don't tell.

9 Q. What's the value of 449 Lawyers Road?

10 A. I believe about 800, 900,000.

11 Q. So Fulton Bank took out a loan for -- how
12 much is your loan for Fulton Bank?

13 A. I believe anywhere from 550 to 650.

14 Q. So about 550, \$600,000?

15 A. Yes, sir.

16 Q. And then when you look at Bala Jain's loan
17 for \$300,000 that hasn't been repaid, so that's
18 greater than the value of the property, right?

19 A. Right.

20 Q. Knowing that now, Bala Jain, if it were to
21 execute its deed of trust and foreclose on the
22 property, that wouldn't be repaid because Fulton Bank